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**FILED**  
DISTRICT COURT OF GUAM

MAR - 8 2006

MARY L.M. MORAN  
CLERK OF COURT

**IN THE UNITED STATES DISTRICT COURT  
FOR THE TERRITORY OF GUAM**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SEUNG JE LEE aka JASON LEE aka  
SANG YOON RHEE,

Defendant.

CRIMINAL CASE NO. 06-00011

**INDICTMENT**

**ATTEMPTED ILLEGAL RE-ENTRY  
OF REMOVED ALIEN**  
[8 U.S.C. §§ 1326(a) and (b)(2)]  
**PRESENTATION OF IMMIGRATION  
DOCUMENT CONTAINING FALSE  
STATEMENT**  
[8 U.S.C. § 1546(a) & 18 U.S.C. § 2]

**THE GRAND JURY CHARGES:**

**COUNT I - ATTEMPTED ILLEGAL RE-ENTRY OF REMOVED ALIEN**

On about February 25, 2006, in the District of Guam, the defendant SEUNG JE LEE aka JASON LEE aka SANG YOON RHEE, an alien, unlawfully and intentionally attempted to enter the United States after having been removed and deported from the United States on about August 25, 1999, at El Centro, California, after having been convicted of aggravated felony offenses, to wit: First Degree Residential Burglary on about June 19, 1998, in the Municipal

1 Court of South Bay Judicial District, County of Los Angeles, State of California, in violation of  
2 Section 459 of the California Statutes; and Possession and Sale of a Controlled Substance, on  
3 about July 8, 1998, in the Municipal Court of California, County of Los Angeles, State of  
4 California, in violation of Section 11378 of the California Statutes; and that prior to his re-  
5 embarkation from a place outside the United States, the defendant SEUNG JE LEE aka JASON  
6 LEE aka SANG YOON RHEE, knew he had not received the consent of the Attorney General of  
7 the United States to reapply for admission and to enter the United States, in violation of Title 8,  
8 United States Code, Sections 1326(a) and (b)(2).

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10 **COUNT II - PRESENTATION OF IMMIGRATION DOCUMENT**  
11 **CONTAINING FALSE STATEMENT**

12 On or about the 25<sup>th</sup> day of February 2006, in the District of Guam, the defendant  
13 SEUNG JE LEE aka JASON LEE aka SANG YOON RHEE, did knowingly present to Customs  
14 and Border Protection a document required by the Immigration laws, or regulations prescribed  
15 thereunder, to wit: an Immigration and Naturalization Service Document, Form I-736, containing  
16 a statement which SEUNG JE LEE aka JASON LEE aka SANG YOON RHEE, knew then and  
17 there was false, to wit: a written statement by SEUNG JE LEE aka JASON LEE aka SANG  
18 YOON RHEE representing that he had never been convicted of an offense when in fact SEUNG  
19 JE LEE aka JASON LEE aka SANG YOON RHEE was previously convicted of the offenses of  
20 First Degree Residential Burglary on about June 19, 1998, in the Municipal Court of South Bay  
21 Judicial District, County of Los Angeles, State of California, in violation of Section 459 of the  
22 California Statutes; and Possession and Sale of a Controlled Substance, on about July 8, 1998, in

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1 the Municipal Court of California, County of Los Angeles, State of California, in violation of  
2 Section 11378 of the California Statutes, in violation of 18 U.S.C. § 1546(a) and 18 U.S.C. § 2.


3 DATED this 8 day of March, 2006.

4 A TRUE BILL.


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8 Forfeiture  
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11 LEONARDO M. RAPADAS  
12 United States Attorney  
13 Districts of Guam and NMI

14 By:

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ROSEETA L. SAN NICOLAS  
Assistant U.S. Attorney

16 Approved:

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18 RUSSELL C. STODDARD  
19 First Assistant U.S. Attorney  
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